

**IN THE UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

ISRAEL GARCIA, individually and on
behalf of a class of similarly situated individuals,

Plaintiff,

No.: 16-CV-02574-MJD-BRT

v.

TARGET CORPORATION, a Minnesota
corporation,

**MOTION FOR CLASS
CERTIFICATION**

Defendant.

PLAINTIFF'S MOTION FOR CLASS CERTIFICATION

Plaintiff Israel Garcia (“Plaintiff”), through his undersigned counsel, and pursuant to Fed. R. Civ. P. 23 and Local Rule 7-1, hereby moves to certify a class of individuals who received unauthorized automated debt collection calls placed by Defendant Target Corporation in violation of the Telephone Consumer Protection Act, 47 U.S.C. § 227, *et seq.*, defined as:

All persons in the United States and its Territories whose cellular telephone number was called by Target for debt collection purposes using a predictive dialer from March 27, 2012 to May 15, 2018, but who were not the debtor on the account as evidenced by a “wrong party” release code in Target’s records and verified by a historical reverse-append.

Plaintiff also respectfully requests that the Court appoint Plaintiff’s Counsel, Eugene Y. Turin and Evan M. Meyers of McGuire, Law, P.C. as Class Counsel, and appoint Robert K. Shelquist of Lockridge Grindal Nauen, P.L.L.P. as Liaison Counsel.

In support of his Motion, Plaintiff submits the concurrently filed memorandum of law.

Dated: September 27, 2018

Respectfully submitted,

ISRAEL GARCIA, individually and on behalf
of a Class of similarly situated individuals

By: /s/ Eugene Y. Turin
One of His Attorneys

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*Counsel for Plaintiff Israel Garcia and
Proposed Class Counsel*

CERTIFICATE OF SERVICE

I hereby certify that, on September 27, 2018, I caused the foregoing *Plaintiff's Motion for Class Certification* to be electronically filed with the Clerk of the Court using the CM/ECF system. A copy of said document will be electronically transmitted to all counsel of record:

/s/ Eugene Y. Turin